

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

NO. 3:18-CR-345-D

v.

ECF

ANDREW KASNETZ

GOVERNMENT’S WITNESS LIST

The United States Attorney for the Northern District of Texas, by and through the undersigned Assistant United States Attorney and Trial Attorney, files this, the Government’s Witness List, in the above-captioned case.

PROBABLE FACT WITNESSES

1. Detective Jeff Rich
Plano Police Department
909 14th Street
Plano, TX 75074

Detective Rich conducted downloads of Torrent files consisting of images and videos depicting minors engaged in sexually explicit conduct from an IP address associated with Defendant’s residence.

2. Detective Chris DeLeon
Dallas Police Department
1400 South Lamar Street
Dallas, TX 75215

Detective DeLeon was the lead investigator for the Dallas Police Department. He obtained a search warrant for Defendant’s residence and electronic devices. Detective DeLeon will testify about his investigation, the search of Defendant’s residence, what items were seized, chain of custody for those items, and his observations of the search.

3. Detective Eric Weast
Dallas Police Department
1400 South Lamar Street
Dallas, TX 75215

Detective Weast was the forensic examiner present when the Dallas Police Department executed the search warrant on Defendant's residence. As part of the forensics conducted by Detective Weast, he took photographs, including a photograph of the computer screen which showed BitTorrent files that were actively downloading on Defendant's HP Envy desktop computer when law enforcement entered Defendant's residence.

4. Detective Daniel Hinton
Dallas Police Department
1400 South Lamar Street
Dallas, TX 75215

Detective Hinton was involved in creating a video walk-through of Defendant's residence during execution of the search warrant and can testify to the chain of custody of electronic devices recovered from the home.

5. Detective Amber Lingenfelter
Garland Police Department
1891 Forest Lane
Garland, TX 75042

Detective Lingenfelter extracted video files from Defendant's security video recording system depicting Defendant in his office immediately before law enforcement officers searched his residence.

6. Detective Scott Neal
Dallas Police Department
1400 South Lamar Street
Dallas, TX 75215

Detective Neal was involved in the search of Defendant's residence and encountered Defendant in his residence.

7. Detective Steven Witt
Dallas Police Department
1400 South Lamar Street
Dallas, TX 75215

Detective Witt was involved in the search of Defendant's residence and entered Defendant's home office.

POSSIBLE FACT WITNESSES

1. Detective Michael Hatfield
Garland Police Department
1891 Forest Lane
Garland, TX 75042

Detective Hatfield was involved the search of Defendant's residence and can testify to the chain of custody on the electronic devices recovered from the home.

PROBABLE EXPERT WITNESSES

1. Special Agent Aaron Covey
Federal Bureau of Investigation
1 Justice Way
Dallas, Texas 75220

Special Agent Covey examined the two computers and electronic devices recovered from Defendant's home pursuant to a search warrant. He will testify about how he conducted his examinations and his conclusions. He may testify about terms common to the community of child exploitation and the methods by which individuals engage in the online exploitation of children. He may also testify about the significance of forensic artifacts found on the defendant's devices and the forensic tools he used. In addition, he may testify about areas that are detailed in the government's Notice of Expert testimony.

2. Trooper Rob Erdley
Pennsylvania State Police
1800 Elmerton Avenue
Harrisburg, Pennsylvania 17110

Trooper Erdley will testify about the use and operation of the BitTorrent network and other areas that are detailed in the government's Notice of Expert testimony.

3. Detective Jeff Rich
Plano Police Department
909 14th Street
Plano, TX 75074

Detective Rich will testify about the use and operation of the BitTorrent network and other areas that are detailed in the government's Notice of Expert testimony.

4. Detective Amber Lingenfelter
Garland Police Department
1891 Forest Lane
Garland, TX 75042

Detective Lingenfelter will testify about forensic tools used to extract video files from a security camera system seized from Defendant's residence as further detailed in the Government's Notice of Expert Testimony.

Respectfully submitted,

ERIN NEALY COX
UNITED STATES ATTORNEY

s/ Shane Read
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CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2022, I electronically filed the foregoing document with the Clerk of Court for the United States District Court, Northern District of Texas, using the electronic case filing system of the Court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorney(s) of record who have consented in writing to accept this Notice as service of this document by electronic means.

s/ Eduardo Palomo
EDUARDO PALOMO
Trial Attorney